

**FILED**  
Clerk  
District Court

**MAR - 6 2008**

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

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Attorney for Defendants

**IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS**

GUIHUA BAI	)	CIVIL ACTION NO. 07-0016
	)	
Plaintiff	)	
	)	
v.	)	
	)	
GINTIAN CORPORATION, dba	)	RESPONSE TO MOTION TO COMPEL
PRODUCTION REQUEST	)	
LIGHT MESSAGE, ZHONG LI and	)	
"MR. ZHU"	)	
Defendant.	)	November 27, 2008
	)	
_____	)	9:00 a.m.

The declaration of G. Anthony Long filed herewith establishes that defendants have responded to discovery and an order compelling discovery is not necessary.

Defendants objections to request numbers 15 and 16 on grounds that they are irrelevant, overbroad and immaterial in as much as they are not subject to any reasonable scope or limitation. *See Glenn v. Williams*, 209 F.R.D. 279, 282 (D.D.C.,2002) Similarly, the objection to interrogatory number 6 is proper as plaintiffs cannot force defendants to identify their witnesses prior to the time set by the court for trial. *IBP, Inc. v. Mercantile Bank of Topeka*, 179 F.R.D. 316, 323 (D.Kan.,1998). Similarly, interrogatory number 16 is not proper as plaintiff is simply trying

to locate assets instead of discoverable knowledge or information. *See Pinkert v. John J. Olivieri, P.A.*, 2001 WL 641737 at 7 ( D.Del. 2001)[The Federal Rules of Civil Procedure do not permit pre-trial discovery of a defendant's finances or of facts concerning a defendant's financial status, or ability to satisfy a judgment].

### CONCLUSION

Plaintiff is not entitled to an order to compel.

Law Office of G. Anthony Long

By: \_\_\_\_\_/s/\_\_\_\_\_  
G. Anthony Long